

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRATTA TO  
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY  
(APWU/USPS-T5-3)  
(February 1, 2012)**

United States Postal Service witness Bratta (USPS-T-5) responds to the above-listed interrogatory of the American Postal Workers Union, AFL-CIO, dated January 17, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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February 1, 2012

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**APWU/USPS-T5-3** Please refer to your testimony page 15, lines 3-10. For the facilities that remain open after Network Rationalization, will there be an increased need for MOS staff?

- a) If there will be an increased need, what is the expected increase in MOS staffing at the remaining facilities?
- b) How will this affect the total protected savings of the Network Rationalization?
- c) If the MOS staffing needs after Network Rationalization has not been examined, please explain why not.

**RESPONSE:**

- a) My testimony and corresponding library references account for the potential increase in the need for MOS Staff.
- b) Not applicable.
- c) Not applicable.